

**Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services**

STATEMENT OF BASIS

**BioLab Facility
BioLab, Inc.
Westlake, Calcasieu Parish, Louisiana
Agency Interest Number: 26073
Activity Number: PER20070001
Proposed Permit Number: 0520-00167-V3**

I. APPLICANT

Company:
BioLab, Inc.
PO Box 520
Westlake, Louisiana 70669-0520

Facility:
BioLab Facility
910 I-10 W
Westlake, Calcasieu Parish, Louisiana
Approximate UTM coordinates are 474.22 kilometers East and 3344.4/ kilometers North, Zone 15

II. FACILITY AND CURRENT PERMIT STATUS

BioLab is an halogenated biocides manufacturing facility. It is currently operating under Permit No. 0520-00167-V2, issued May 27, 2004.

III. PROPOSED PROJECT/PERMIT INFORMATION

Application

A permit application and Emission Inventory Questionnaire was submitted by BioLab, Inc. on September 10, 2007, with additional information dated October 22, 2007 requesting a Part 70 operating permit renewal for the BioLab Facility located in Westlake, Louisiana.

Project

The permit renewal incorporates minor modifications, including the installation of two natural gas boilers for steam generation at the facility and the addition of one 64 hp emergency generator.

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Estimated emissions in tons per year are as follows:

Pollutant	Before	After	Change
PM ₁₀	28.94	30.17	+ 1.23
SO ₂	-	0.11	+ 0.11
NO _x	-	9.51	+ 9.51
CO	-	24.71	+24.71
VOC	-	0.89	+ 0.89

Toxic Pollutant:

Formaldehyde	0.02
Chlorine	15.32
Hydrochloric Acid	0.01
Total	15.35

IV REGULATORY ANALYSIS

This permit was reviewed for compliance with 40 CFR 70, the Louisiana Air Quality Regulation, NESHAP and NSPS. Prevention of Significant Deterioration does not apply.

Applicability and Exemptions of Selected Subject Items

The applicability of appropriate regulations is straightforward and provide in the Facility Specific Requirements Section of the draft permit, or Table 2 of the Air Permit Briefing sheet. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are. Applicability provided in the Facility Specific Requirements Section of the draft permit, or explained in Table 2 of the Air Permit Briefing Sheet.

Prevention of Significant Deterioration/Nonattainment Review

The BioLab Facility located in Westlake, Louisiana, is not a major source of criteria air pollutants and does not operate under a Prevention of Significant Deterioration (PSD).

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MACT Requirements

N/A

Air Modeling Analysis

Not applicable for minor emission increases.

General Condition XVII Activities

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping requirements. For a list of approved General Condition XVII Activities, refer to the Section VIII – General Condition XVII Activities of the proposed permit.

Insignificant Activities

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to the Section IX – Insignificant Activities of the proposed permit.

V. PERMIT SHIELD

A permit shield was not requested.

VI. PERIODIC MONITORING

Periodic monitoring is not required.

VII. GLOSSARY

Carbon Monoxide (CO) – A colorless, odorless gas, which is an oxide of carbon.

Maximum Achievable Control Technology (MACT) – The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

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Hydrogen Sulfide (H_2S) – A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the reaction of acids on metallic sulfides, and is an important chemical reagent.

New Source Review (NSR) – A preconstruction review and permitting program applicable to new or modified major stationary sources of air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C (“Prevention of Significant Deterioration of Air Quality”) and D (“Nonattainment New Source Review”).

Nitrogen Oxides (NO_x) – Compounds whose molecules consist of nitrogen and oxygen.

Organic Compound – Any compound of carbon and another element. Examples: Methane (CH_4), Ethane (C_2H_6), Carbon Disulfide (CS_2)

Part 70 Operating Permit – Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit: ≥ 10 tons per year of any toxic air pollutant; ≥ 25 tons of total toxic air pollutants; and ≥ 100 tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

PM_{10} – Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) – The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

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Sulfur Dioxide (SO₂) – An oxide of sulfur.

Sulfuric Acid (H₂SO₄) – A highly corrosive, dense oily liquid. It is a regulated toxic air pollutant under LAC 33:III.Chapter 51.

Title V Permit – See Part 70 Operating Permit.

Volatile Organic Compound (VOC) – Any organic compound, which participates in atmospheric photochemical reactions; that is, any organic compound other than those, which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.